

Schena, Cristeen

Subject: FW: In the Matter of JCI Jones Chemicals, Inc. (Merrimack, NH)
Importance: High

From: Beveridge, Laura
Sent: Tuesday, December 16, 2014 2:42 PM
To: Beveridge, Laura
Subject: Fw: In the Matter of JCI Jones Chemicals, Inc. (Merrimack, NH)

From: Tim Gaffney <tgaffney@jcichem.com>
Sent: Tuesday, February 25, 2014 5:01 PM
To: Beveridge, Laura
Subject: In the Matter of JCI Jones Chemicals, Inc. (Merrimack, NH)

Hi Laura,

In accordance with your January 24, 2014 letter that accompanied the Consent Agreement and Final Order In the Matter of JCI Jones Chemicals, Inc. Docket Nos. CAA 01-2013-0047 & CERCLA 01-2013-0048, attached please find a completely revised Process Hazard Analysis (PHA) for the JCI Jones Chemicals, Inc. (JCI) facility in Merrimack, New Hampshire. In addition to the specific items that the USEPA requested JCI to address in the PHA, JCI as part of its five-year re-validation of the PHA made substantial additional changes to the PHA. In addition to identifying a number of additional "What-If?" scenarios, JCI also included in its "What-If?" methodology a section on the "safeguards" for each scenario. In addition, to make sure that we adequately addressed all of the USEPA's comments on the PHA as well as to make sure that we conducted the PHA in accordance with all USEPA and OSHA regulations and requirements, we solicited the assistance of the consulting firm Arcadis U.S., Inc. in the re-validation of the PHA. Also attached is a copy of the sign-in sheet for the JCI and Arcadis personnel who participated in the PHA process, as well a copy of the letter prepared by the Senior Consultant - PSM/RMP Compliance Specialist from Arcadis who participated in the PHA process.

Please let me know if you would like me to mail you out a hard copy of the attached documents or if this electronic submittal will suffice.

Thank you.

Tim Gaffney

Timothy J. Gaffney
Executive Vice President
JCI Jones Chemicals, Inc.
100 Sunny Sol Boulevard
Caledonia, New York 14423
(585) 538-2314 (Phone)
(585) 538-2316 (Fax)
tgaffney@jcichem.com